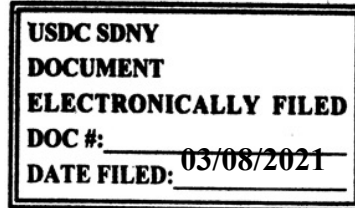


Law Offices of Irina Roller, PLLC

40 Wall Street
Suite 2508
New York, New York 10005



Telephone (212) 688-1100
Facsimile (212) 706-9362
Email: Hearings@RollerEsq.com

MEMO ENDORSED

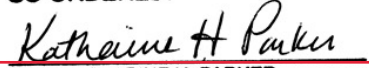
March 8, 2021

Via ECF

Hon. Katharine H. Parker,
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

The telephonic Initial Case Management Conference scheduled for Tuesday, March 9, 2021 at 10:00 a.m. is hereby rescheduled to Monday, May 24, 2021 at 12:30 p.m. Counsel for the parties are directed to call Judge Parker's court conference line at the scheduled time. Please dial (866) 434-5269, Access code: 4858267. The Plaintiff is directed to serve this endorsement, and a copy of the complaint on the Defendant.

SO ORDERED:


HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE
03/08/2021

Re: J.M.-U., individually and on behalf of P.U., a minor
Case #1:20-cv-10600

Your Honor:

Please be advised that our firm represents the Plaintiffs in the above-referenced action. I write on behalf of the Plaintiffs to request an adjournment of tomorrow's Initial Pre-Trial Conference (ECF 6). This is the first request for an adjournment.

Plaintiffs brought this action seeking to recover attorney's fees incurred in the course of administrative proceedings brought under the Individuals with Disabilities Education Improvement Act, 20 U.S.C. §§ 1400, *et seq.* and this federal action. Plaintiffs filed the complaint on December 15, 2020 (ECF No.: 1). However, we had to correct the filing which we did today. We have also served the Defendant by way of its New York City Law Department today.

I contacted Martin Bowe, Esq. of the New York City Law Department today after I became aware that Complaint was not served and following a call from your Honor's Chambers to confirm tomorrow's conference. It is then that I became aware that the Defendant had not yet appeared because we had not yet served them. I contacted Mr. Bowe because prior similar cases with our firm were under his supervision, but I understand that since the Summons and Complaint were not previously served that the New York City Law Department has yet to appear in the action.

I sincerely apologize for any confusion and seek an adjournment of the Initial Pre-Trial Conference to allow sufficient time for the Defendant to appear, and for the parties to work on settling this matter. I have settled a number of other similar cases with the New York City Law

Department and feel confident that we will work in good faith to settle this case as well.

Respectfully submitted,

/s

Irina Roller

Attorney for the Plaintiffs

Cc: New York City Law Department
Attorneys for Defendants
Via email to Martin Bowe, Esq.